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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANGELA EVANS. an individual,

Plaintiff,

vs.

VALLEY ELECTRIC ASSOCIATION, INC.;
DOES I through X; and ROE Corporations XI
through XX, inclusive,

Defendants.

ANGELA EVANS,

Plaintiff,

VS.

NYE COUNTY SHERIFF'S OFFICE, a political subdivision of the State of Nevada; DAVID BORUCHOWITZ, individually,

Defendants.

Case No. 2:20-cv-00986-RFB-VCF

Case No. 2:20-cv-01919-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANT TO FILE REPLY IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT (ECF NO.
80) AND RESPONSE TO
PLAINTIFF'S MOTION
UNDER FRCP 56(D) (ECF NO. 87)**

FIRST REQUEST

ANGELA EVANS (“Evans”), and VALLEY ELECTRIC ASSOCIATION, INC. (“VEA”) by and through their respective counsel, stipulate as follows:

WHEREAS, on November 19, 2021, Defendant Valley Electric Association, Inc. (“VEA”) filed a motion for summary judgment (ECF No. 80);

WHEREAS, on January 10, 2022, Plaintiff opposed such motion (ECF No. 86) and also filed a Rule 56(d) motion:

1 WHEREAS, at present, VEA's reply in support of its motion for summary judgment, and
2 its response to Plaintiff's Rule 56(d) motion, are due on January 24, 2022;

3 WHEREAS, due to the case load of VEA's counsel, VEA requires additional time to
4 complete and submit the aforementioned items. Specifically, over the last several weeks, the
5 working time of VEA's counsel has been largely consumed by preparations for a 54-plaintiff
6 preliminary injunction hearing and other pressing matters;

7 NOW, THEREFORE, THE PARTIES, by and through their respective counsel of record,
8 **STIPULATE AND AGREE** as follows:

- 9 1. The deadline by which VEA must file and serve its reply in support of motion for summary
10 judgment, and its response to Plaintiff's Rule 56(d) motion, which is currently scheduled
11 for January 24, 2022, is continued to February 7, 2022;
- 12 2. No other deadlines will be affected.

13 Pursuant to LR IA 6-1, the parties state that this is the first extension of the deadline noted
14 above. The parties have also sought and received discovery extensions, and due to personal
15 circumstances affecting her counsel, Plaintiff sought and received an extension of her deadline to
16 oppose VEA's motion for summary judgment. Good cause exists for this extension, as other
17 urgent litigation matters have consumed the working time of VEA's counsel, and as such,

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1 additional time is needed to finalize and file VEA's reply.

2 **IT IS SO STIPULATED.**

3 Dated this 24th day of January, 2022.

4 GABROY LAW OFFICES

5 By: /s/ Christian Gabroy

6 Christian Gabroy, Esq.
7 Nevada Bar No. 8805
8 Kaine Messer, Esq.
9 Nevada Bar No. 14240
The District at Green Valley Ranch
170 South Green Valley Pkwy., Ste 280
Henderson, NV 89012
Attorneys for Plaintiff

Dated this 24th day of January, 2022.

FENNEMORE CRAIG, P.C.

By: /s/ Shannon S. Pierce

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Reno, NV 89511
*Attorneys for Valley Electric
Association, Inc.*

10 **IT IS SO ORDERED.**

11 DATED this 25th day of January, 2022.

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16 **RICHARD F. BOULWARE, II**
17 **United States District Court**
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